



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MAA/LB/CJN
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 18, 2024

By Email and ECF

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Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019 ("the Protective Order"). See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Records regarding the Professor.	Sensitive Discovery Material (“SDM”)	DOJ_HUAWEI_A_0124186973 – DOJ_HUAWEI_A_0124186983
Company 2 records.	SDM	DOJ_HUAWEI_A_0124186984 – DOJ_HUAWEI_A_0124187048
Records regarding a technologies company.	SDM	DOJ_HUAWEI_A_0124187049 – DOJ_HUAWEI_A_0124187782
Records regarding the Professor.	SDM	DOJ_HUAWEI_A_0124187783 – DOJ_HUAWEI_A_0124188366
Records regarding a Huawei vendor.	SDM	DOJ_HUAWEI_A_0124188367 – DOJ_HUAWEI_A_0124188380
Records regarding the Professor.	Discovery Material (“DM”)	DOJ_HUAWEI_A_0124188381 – DOJ_HUAWEI_A_0124188908
Company 2 records.	DM	DOJ_HUAWEI_A_0124188909 – DOJ_HUAWEI_A_0124189192
Records regarding a technologies company.	DM	DOJ_HUAWEI_A_0124189193 – DOJ_HUAWEI_A_0124189222
Records regarding the Professor.	DM	DOJ_HUAWEI_A_0124189223 – DOJ_HUAWEI_A_0124189830
Records regarding a Huawei vendor.	DM	DOJ_HUAWEI_A_0124189831 – DOJ_HUAWEI_A_0124189835
Miscellaneous Huawei bank records.	SDM	DOJ_HUAWEI_A_0124189836 – DOJ_HUAWEI_A_0124189840
Miscellaneous law enforcement records.	SDM	DOJ_HUAWEI_A_0124189841 – DOJ_HUAWEI_A_0124225572
Miscellaneous Huawei bank records.	DM	DOJ_HUAWEI_A_0124225573 – DOJ_HUAWEI_A_0124225590
Miscellaneous law enforcement records.	DM	DOJ_HUAWEI_A_0124225591 – DOJ_HUAWEI_A_0124226310

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Visa and travel records.	DM	DOJ_HUAWEI_A_0124226311 – DOJ_HUAWEI_A_0124226337
Miscellaneous law enforcement records.	DM	DOJ_HUAWEI_A_0124226338 – DOJ_HUAWEI_A_0124226729
Visa and travel records.	DM	DOJ_HUAWEI_A_0124226730 – DOJ_HUAWEI_A_0124226766

Very truly yours,

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